



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 27, 2012

RE: CUYAHOGA COUNTY  
CITY OF SOLON  
SOLON VILLAGE  
CONSTRUCTION STORM WATER

Mr. Phillip Bishop  
Echo Solon LLC  
701 Alpha Drive  
Pittsburg, PA 15238

Mr. Brian Barringer  
Continental Building Systems  
150 Broad Street  
Columbus, OH 43215

Mr. Guy Cunningham  
Digioia-Suburban Excavating LLC  
11293 Royalton Road  
North Royalton, OH 44133

Dear Mr. Bishop, Mr. Barringer, and Mr. Cunningham

On June 4, 2012, I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. I was accompanied by Dan Bogoevski of our Division of Surface Water. Prior to my inspection, I met with the following officials of the City of Solon to review the Storm Water Pollution Prevention Plan (SWP3): Matt Hartzell, Assistant to the City Engineer, Keri Welch, Assistant to the City Engineer, and Ryan Maver, Project Engineer. Our records indicate that the Echo Solon, LLC has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05914\*AG.

After review of the site and SWP3, I noted the following deficiencies of the NPDES permit:

General

1. An alternative post-construction BMP was show on the SWP3. Be aware that prior approval from the EPA is needed for using alternative post-construction BMP on large construction sites. Mr. Bogoevski is still in the process of reviewing your alternative BMP request and will provide you with comments in separate correspondence. If you need to contact Mr. Bogoevski, please feel free to call him at (330) 963-1145 or by e-mail at [Dan.Bogoevski@epa.state.oh.us](mailto:Dan.Bogoevski@epa.state.oh.us).
2. Any stockpile of soil that will remain undisturbed for 21 days or longer is subject to the temporary stabilization requirements of the NPDES permit. Temporary stabilization must be initiated within seven days of last disturbance, e.g., addition or subtraction of material.

Construction activities on this site are currently limited to three non-contiguous areas within the site. For clarity, our observations will be discussed by site location.

Northeast Site

3. There is a second construction entrance. It has been improperly constructed. The inlet protection on the nearby catch basin to account for this is also improperly constructed (see enclosed specification from *Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection* (Ohio Department of Natural Resources, 2006, for proper construction of inlet protection within paved areas). The second entrance must be closed off or made into a proper construction entrance. Adding a construction entrance would require an amendment to the SWP3 to show its location.
4. The concrete washout area was not where it was supposed to be on the plan. It is also not the design that the SWP3 called for. Concrete washout pits must ensure that washwater is contained and kept on site. Washwater cannot be discharged into storm drainage systems.
5. The silt fence was not properly trenched and backfilled; shown by the bulging of the fence (see Fig 5). Please repair the silt fence per specifications contained in the SWP3.

Future Get-Go Site

6. The southwest silt fence next to the stock pile was also not trenched and backfilled. The stock pile is also pushing against the fence. A buffer needs to be kept between the pile and the fence to ensure proper ponding.
7. There is an asphalt pile on the site that was not called for in the SWP3. This must be taken off the site and disposed of properly.

Future Giant Eagle Site

8. There is no silt fence around the wetlands even though that is what was called for in the SWP3. Please install the silt fence per SWP3.
9. There is an area of disturbance along the southern edge of the existing shopping center where soil has been pushed onto the pavement. This has resulted in sediment being discharged to existing catch basins. Due to the limited nature of disturbance and potential concerns with ponding around the catch basin, we recommend that the disturbed area be re-graded to drain back onto the construction area, or the disturbed area be temporarily stabilized (Fig 11 & 12).
10. There is a soil stockpile within this construction area that was not called for in the SWP3. Either the SWP3 needs to be amended or this pile needs to be removed.
11. Storm drain inlet protection has been installed on existing catch basins within this area, but some require maintenance. Please repair or replace so no sediment can get into the storm sewer.
12. The SWP3 calls for silt fence along the eastern perimeter. This has not been installed. However, as graded, runoff appears to concentrate in the NE corner of this work area. The drainage area appears to be larger than is allowable for silt fence. A sediment trap may be more appropriate, at least during this initial phase of construction. Please consult with your project engineer to determine a proper course of corrective action. A BMP is needed here to protect wetlands and downstream drainage systems.
13. The SWP3 also calls for silt fence along the west site perimeter. This has also not been installed. Please install per plan.
14. The rock construction entrance (RCE) shown on the SWP3 was not installed, yet construction vehicles have been accessing the site. Please install the RCE as shown on

the SWP3. In addition, we noted that there is a second gate in the SW corner of the existing shopping center that is being used for site access. An RCE has not been installed here either. If you intend to keep using this as a construction entrance, the SWP3 must be amended to show an RCE in this location and it must be built per specifications contained in the SWP3.

15. There were containers of antifreeze and other petroleum products on the ground. These must be stored inside or within secondary containment. Spill kits should be kept on site to clean up spills if they occur.

You are directed to provide me with a letter of response indicating the actions that you have taken or will take to address the deficiencies noted above. Include any amendments to the SWP3 with your response. Your response must be received no later than July 11, 2012. Failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines.

If you have any questions, please contact me at (330) 963-1125 or by email at [Katie.Bowman@epa.state.oh.us](mailto:Katie.Bowman@epa.state.oh.us)

Sincerely,



Katie Bowman  
Assistant to the District Engineer  
Division of Surface Water

KB/cs

cc: Todd Houser, Storm Water Program Manager, Cuyahoga County  
Susan A. Drucker, Mayor, City of Solon  
John Busch, P.E., Engineer, City of Solon

Attachments: Photos, *Rainwater and Land Development* pages

**INSPECTION PHOTOS**

**Solon Village**

**Northeast Site**



**Figure 1:** The second construction entrance that was not called for.  
**Figure 2:** Nearby catch basin without proper inlet protection



**Figures 3&4:** Concrete washout pit. Note that it does not provide containment for washwater.



**Figure 5:** Silt fence not trenched and backfilled.

Northwest Site



**Figures 6&7:** Soil stock pile too close to silt fence. Silt fence joints not twisted together.  
**Figure 8:** Asphalt pile

South Site



**Figures 9&10:** Orange fence along wetlands without silt fence.



**Figures 11&12:** Dirt being pushed onto pavement. Sediment running to nearby catch basin.



**Figure 13:** Northern dirt wall



**Figure 14:** Northeast corner of the property. All water flows here.



**Figures 15&16:** Existing catch basins with failing inlet protection.



**Figure 17:** Unplanned entrance on the northwest side



**Figure 18:** Construction entrance not built correctly

**Figure 19:** Unmarked liquids. Petroleum products.

